

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDY LODERMEIER, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

against

AGRIA CORPORATION, GUANGLIN LAI,
KENNETH HUA HUANG, GARY KIM TING
YEUNG, ZHAOHUA QIAN, ZHIXIN XUE,
GEOFFREY DUYK, TERRY MCCARTHY,
JASMINE MARRERO, CREDIT SUISSE
SECURITIES (USA) LLC, HSBC SECURITIES
(USA) INC., PIPER JAFFRAY & CO., CIBC
WORLD MARKETS CORP. and BROTHERS
CAPITAL LIMITED,

Defendants.

08 Civ. 4456 (WHP)

**MOTION TO ADMIT
COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, David M. Brodsky, a member in good
standing of the bar of this Court, hereby move for an Order, allowing the admission pro hac vice
of

Philip J. Wang

LATHAM & WATKINS LLP

140 Scott Drive

Menlo Park, CA 94025

Tel: (650) 328-4600

Fax: (650) 463-2600

E-Mail: philip.wang@lw.com

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

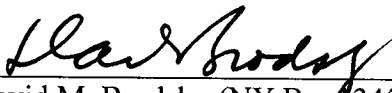
Philip J. Wang is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Philip J. Wang in any State or Federal court.

Dated: June 9, 2008

New York, New York

Respectfully submitted,

LATHAM & WATKINS LLP

By: 
David M. Brodsky (NY Bar #345131)

885 Third Avenue, Suite 1000
New York, New York 10022
T: (212) 906-1200
F: (212) 751-4864
Counsel for Defendants
Agria Corporation

To: All Counsel of Record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDY LODERMEIER, Individually and On
Behalf of All Others Similarly Situated,

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& CO., CIBC WORLD MARKETS CORP. and
BROTHERS CAPITAL LIMITED,

Defendants.

08 Civ. 4456 (WHP)

**ORDER GRANTING MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

Upon the motion of David M. Brodsky, attorney for Defendant Agria Corporation and
said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Philip J. Wang

LATHAM & WATKINS LLP

140 Scott Drive

Menlo Park, CA 94025

Tel: (650) 328-4600

Fax: (650) 463-2600

E-Mail: philip.wang@lw.com

is admitted to practice pro hac vice as counsel for Defendant Agria Corporation in the above-
captioned case in the United States District Court for the Southern District of New York. All
attorneys appearing before this Court are subject to the Local Rules of this Court, including the

Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: June ___, 2008
New York, New York

Honorable William H. Pauley
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Defendants.

08 Civ. 4456 (WHP)

**AFFIDAVIT OF
DAVID M. BRODSKY IN
SUPPORT OF MOTION TO
ADMIT COUNSEL PRO
HAC VICE**

David M. Brodsky, hereby declares under the penalty of perjury as follows:

1. I am a member of the law firm of Latham & Watkins LLP, counsel for Defendant Agria Corporation in this action. I submit this Affidavit in support of the motion, pursuant to Local Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, for an Order granting Philip J. Wang admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York in order to represent Defendant Agria Corporation in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1968. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have reviewed the Declaration of Philip J. Wang in support of the motion for admission *pro hac vice* submitted herewith, and I believe that the declaration is true and correct. Philip J. Wang is fully familiar with the facts of this case.

4. I have found Philip J. Wang to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. I respectfully submit a proposed order granting the admission of Philip J. Wang, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the Court grant the motion for the admission *pro hac vice* of Philip J. Wang to the bar of the United States District Court for the Southern District of New York.

Dated: June 9, 2008

New York, New York

Notarized:

Gloria E. Torres

Sworn to before me on this
day, 9th, June, 2008

Respectfully submitted,

David M. Brodsky
David M. Brodsky (NY Bar 1345131)

GLORIA E. TORRES
Notary Public, State of New York
No. 03-4723693
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires January 31, 2011

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Behalf of All Others Similarly Situated,

Plaintiff,

against

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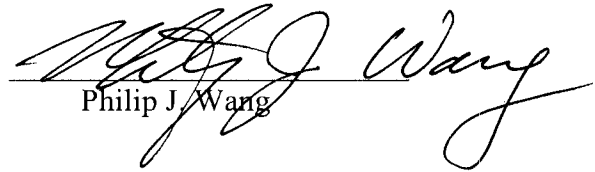
08 Civ. 4456 (WHP)

**DECLARATION OF
PHILIP J. WANG**

Philip J. Wang hereby declares under the penalty of perjury as follows:

1. I am a member of the law firm of Latham & Watkins, LLP, located at 140 Scott Drive, Menlo Park, California, 94025.
2. I submit this Declaration in support of the motion to admit counsel *pro hac vice* in the above-captioned matter. As demonstrated by the Certificate of Good Standing attached hereto, I am a member in good standing of the Bar of the State of California.
3. There are no pending disciplinary proceedings against me in any State or Federal Court.
4. Wherefore, I respectfully request that I be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
9th day of June, 2008, in Menlo Park, California.


Philip J. Wang



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

June 3, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, PHILIP JENG-HUNG WANG, #218349 was admitted to the practice of law in this state by the Supreme Court of California on December 28, 2001; that at his request, on July 31, 2003, his name was changed to PHILIP J. WANG on the records of the State Bar of California; that from the date of admission to March 8, 2002, he was an ACTIVE member of the State Bar of California; that on March 8, 2002, he transferred at his request to the INACTIVE status as of January 1, 2002; that from that date to July 21, 2003, he was an INACTIVE member of the State Bar of California; that on July 21, 2003, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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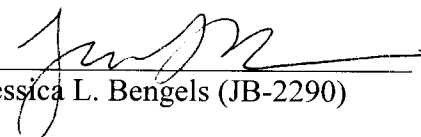
CERTIFICATE OF SERVICE

I, Jessica L. Bengels, hereby certify that on June 11, 2008, true and correct copies of the annexed Motion to Admit Counsel Pro Hac Vice, dated 6/9/08, [Proposed] Order Granting Motion to Admit Counsel Pro Hac Vice, Affidavit of David M. Brodsky in Support of Motion to Admit Counsel Pro Hac Vice, dated 6/9/08, Declaration of Philip J. Wang, dated 6/9/08, and Declaration of James J. Farrell, dated 6/6/08, were caused to be served in accordance with the Federal Rules of Civil Procedure, via First Class United States Mail upon:

Fei-Lu Qian, Esq.
Jeremy Alan Lieberman, Esq.
Marc I. Gross, Esq.
Pomerantz Haudek Block Grossman & Gross LLP
100 Park Avenue, 26th Floor
New York, NY 10017

LATHAM & WATKINS LLP

By:


Jessica L. Bengels (JB-2290)

885 Third Avenue, Suite 1000
New York, New York 10022
(212) 906-1200
Counsel for Agria Corporation